

**Wittels
McInturff
Palikovic**

April 17, 2025

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Swanson et al. v. Manhattan Beer Distributors, LLC et al.*, No. 15 Civ. 5383-ENV-TAM

Dear Judge Merkl:

The parties write jointly pursuant to Local Civil Rule 7.1(d) to request that the Court extend the stay in this action for an additional 60 days, to June 20, 2025. The stay is currently set to expire on April 21, 2025.

The reason for this request is that although the parties are continuing to work through issues and have made substantial progress in negotiating the final Class Action Settlement Agreement (“Agreement”) and developing a notice plan, a number of outstanding issues still remain that the parties are working collaboratively to resolve. The request is for an additional 60 days to complete the work that remains outstanding and to provide enough time for to adequately address the anticipated motion for preliminary approval of the Agreement.

For these reasons, the parties respectfully request a 60-day extension of the stay and deadline to file a motion for preliminary class settlement approval, to June 20, 2025. This is the third request to extend the stay the Court originally entered on September 20, 2024. The parties are hopeful that this will be their last request for an extension of the stay.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Steven L. Wittels
Steven L. Wittels

cc: All Counsel of Record (via ECF)